

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

FAMBROUGH, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	Case No. 4:19-cv-00218-SRB
	)	
MISSOURI FAMILY SUPPORT	)	
DIVISION,	)	
	)	
Defendant.	)	

**MOTION FOR ADDITIONAL TIME**  
**TO RESPOND TO PLAINTIFFS' COMPLAINT**

Defendant Missouri Family Support Division ("FSD"), by and through undersigned counsel, hereby requests an additional twenty-one (21) days to answer or otherwise respond to Plaintiffs' Complaint, up to and including Friday, October 18, 2019. In support of this Motion, FSD states as follows:

1. Plaintiffs filed their Complaint in this case on April 15, 2019. *See* Doc. 8.
2. FSD was served on September 6, 2019. *See* Doc. 11.
3. Undersigned counsel was recently assigned to this case and requires additional time to prepare an appropriate response to Plaintiffs' Complaint on behalf of FSD.
4. This request is made in good faith and not for purposes of

hindering or delaying the judicial process.

5. Granting additional time for FSD to respond to Plaintiffs' Complaint will not prejudice any party.

WHEREFORE, Defendant Missouri Family Support Division moves this Court for an Order granting its Motion for an additional twenty-one (21) days to answer or otherwise respond to Plaintiffs' Complaint, up to and including Friday, October 18, 2019, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

**ERIC S. SCHMITT**  
**Attorney General**

/s/ Laura M. Robb  
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*Attorney for Defendant Missouri Family  
Support Division*

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 26, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent electronic notification to all counsel of record, and I mailed a copy to Plaintiffs at:

Heather and William Fambrough  
6101 N. Belleview Ave.  
Kansas City, MO 64118

/s/ Laura M. Robb